

**Issues of Concern to the California Metro Fire Chiefs
Regarding Office of the State Fire Marshal's
Proposed Amendments to the 2006 International Fire Code**

Submitted on behalf of:

Alameda County Fire Department
Contra Costa County Fire Department
Kern County Fire Department
Long Beach Fire Department
Los Angeles County Fire Department
Los Angeles Fire Department
Oakland Fire Department
Orange County Fire Authority
Sacramento Fire Department
Sacramento Metro Fire Department

1. SECTIONS 4706 VEGETATION MANAGEMENT [RESERVED] and 4707 DEFENSIBLE SPACE [RESERVED]

The scope of Chapter 47, Requirements for Wild land–Urban Interface Fire Areas, addresses mitigation of conditions where a wildfire burning in vegetation may readily transmit fire to buildings and threaten to destroy life, overwhelm fire suppression capabilities, or result in large property losses. This section sets the minimum standards to increase the ability of a building to resist the intrusion or burning embers being projected by a vegetation fire and contributes to a systematic reduction in conflagration losses through the use of performance and prescriptive requirements.

Metro Fire Chiefs agree that this minimum performance standard is a vital component in the effort to minimize potential loss of life and conflagration in the event of a wild land fire. We also believe that vegetation management and defensible space requirements are equally important elements in creating a comprehensive wild land-urban interface fire defense system.

A look at California's recent wild land fire history demonstrates the point that the use of performance and prescriptive structural requirements may not be enough to prevent conflagration and substantial property loss:

Historically Significant Wildland Fires				
Date	Name	Location	Acres	Significance
June 1990	Painted Cave	California	4,900	641 structures destroyed
October 1991	Oakland Hills	California	1,500	25 lives lost and 2,900 structures destroyed
October 1993	Laguna Hills	California	17,000	366 structures destroyed in 6 hours
October 2003	Cedar	California	275,000	2,400 structures destroyed 15 lives lost

Metro Fire Chiefs are supporting a more integrated approach to the problem of guarding against the negative potentials of wild land fires. Our approach includes Vegetation Management and providing a Defensible Space around structures located in California's Very High Fire Hazard Severity Zones, (VHFHSZ) in addition to the structural requirements proposed for IFC, chapter 47. Guidelines for Vegetation Management and Defensible Space are currently in the Public Resources Code 4291 for State Responsibility Areas (SRA), Appendix 2A, Section 16 and 17 of the CFC and other California legislation. Because the current recommendations are located in several different code areas, the concept of a comprehensive wild land-urban interface fire protection system is not fully described and as easily discernable as it would be if located in one code section. Moving CFC appendix 2A into Sections 4606 and 4707, along with the package of IFC structural amendments, will resolve this issue. Managed Vegetation will have the effect of fortifying the prescriptive performance requirements of Section 47 of the California Fire Code, while also creating a defensible space.

It is understood that the IFC amendments package under consideration is structural in nature and that non-structural amendments are not normally considered in this forum. Metro Fire Chiefs are asking the Building Standards Commission to consider combining the Public Resources Code 4291 for SRA and the Vegetation Management/Defensible Space provisions in appendix 2A of the CFC. The combined language could then be inserted into sections 4706 and 4707 of the IFC.